

**IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA**

CTC, INC.,	)	
	)	<i>Attorneys Lien Claimed</i>
Plaintiff,	)	<i>Jury Trial Demanded</i>
	)	
vs.	)	<b>Case No.</b> CIV-20-1235-F
	)	
(1)SCHNEIDER NATIONAL INC and	)	
(2)SCHNEIDER NATIONAL CARRIERS, INC.,	)	
	)	
Defendants.	)	

**COMPLAINT**

**COMES NOW** the Plaintiff, CTC, Inc., (“Plaintiff”) and for its cause of action against the Defendants Schneider National, Inc. and Schneider National Carriers, Inc. (“Defendant”), alleges and states as follows:

1. Plaintiff is an Oklahoma corporation domiciled in the State of Oklahoma with its principal place of business in Oklahoma County.
2. Defendant is a foreign corporation with its principal place of business located in the State of Wisconsin.
3. That on or about the 9<sup>th</sup> day of June, 2020 Plaintiff’s tractor became disabled and was legally parked on the shoulder of the interstate within the State of Oklahoma.
4. That on said date, Defendant’s driver lost control of his tractor trailer and collided with the Plaintiff’s tractor trailer.
5. The collision caused property damage to Plaintiff’s tractor and trailer.
6. The collision also caused damage to the cargo and the need for cleaning of debris and other materials.
7. The collision occurred as a result of the negligence of Defendant’s driver who failed to

devote full time and attention to driving, possibly falling asleep at the wheel; failed to keep a lookout ahead; failed to stay in the designated lane of travel and failed to avoid a collision with Plaintiff's tractor trailer.

8. Defendant's driver was at all times an employee and/or agent of Defendant and Defendant is responsible for the actions and negligence of its driver pursuant to the doctrine of Respondeat Superior and agency law.
9. Defendant was negligent in the training, retention and supervision of its driver and was negligent per se.
10. Plaintiff has been damaged as a result of the collision and has sustained property damage, cleanup costs, cargo loss, towing costs, loss of use of its equipment and loss of income and profits. Plaintiff has incurred additional consequential and incidental damages, including projected insurance costs increases as well as attorney fees and costs all to the detriment of Plaintiff and all caused by the negligence of the Defendant. Plaintiff seeks damages in an amount in excess of \$75,000.00 together with the costs of this action, attorney fees and other amounts deemed just by the Court.

Respectfully submitted,

By: /s/Daniel M. Delluomo  
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